

# TECHNICAL MEMORANDUM

## Utah Coal Regulatory Program

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July 13, 2005

TO: Internal File

THRU: D. Wayne Hedberg, Permit Supervisor

FROM: Wayne H. Western, Team Lead

RE: Surface Facility Update, Canyon Fuel Company, LLC, SUFCO Mine, C/041/0002, Task ID #2278

### **SUMMARY:**

In connection with the midterm review, the Division reviewed the reclamation cost estimate and the surface facilities. The Division found that the reclamation cost estimates and the surface facilities map were outdated and required to Permittee to update those items. Task 2278 is the Permittee's response to those requests.

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**TECHNICAL ANALYSIS:**

**OPERATION PLAN**

**MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS**

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

**Analysis:**

**Mining Facilities Maps**

Plate 5-2A, Detail of East Spring Canyon Surface Facilities and Plate 5-2B Extended East Spring Canyon Surface Facilities are updated surface facilities maps. The maps show the current structures and facilities at the main SUFCo facility. In addition Table 5-4, Description of Existing Structures has been updated.

**Certification Requirements**

Plate 5-2A, Detail of East Spring Canyon Surface Facilities and Plate 5-2B Extended East Spring Canyon Surface Facilities were properly certified.

**Findings:**

The Permittee met the minimum requirements for this section of the regulations.

**RECLAMATION PLAN**

**BONDING AND INSURANCE REQUIREMENTS**

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

**Analysis:**

**Determination of Bond Amount**

In June 2005, the Division estimated the cost to reclaim the SUFCo Mine in the event of bond forfeiture at \$2,616,000 in 2009 dollars. The current bond \$4,439,000 dollars. The amount

of bond in excess of the required amount is \$1,823,000. Therefore, the Permittee currently has adequate bond.

**Findings:**

The Permittee met the minimum requirements for this section of the regulations.

**RECOMMENDATIONS:**

The Division should approve the amendment.